

UNITED STATES DISTRICT COURT  
DISRTICT OF MASSACHUSETTS  
IN ADMIRALTY

GREAT LAKES INSURANCE SE,

Plaintiff,

Case No. 4:21-cv-40087

vs.

MARTIN ANDERSSON,  
Defendant.

/

**PLAINTIFF'S EXPERT DISCLOSURES**

COMES NOW the Plaintiff GREAT LAKES INSURANCE SE (hereinafter "GREAT LAKES"), by and through its undersigned attorneys, and pursuant to Rule 26(a)(2)(B) of the Federal Rules of Civil Procedure, the Local Rules of the United States District Court for the District of Massachusetts, provides this its Expert Disclosures, as follows:

Andrew G. Ball  
Caribbean Marine Surveyors Ltd.  
Caribbean Adjusters and Marine Surveyors Ltd.  
[www.caribsurveyors.com](http://www.caribsurveyors.com)  
IAMI #04122 | SAMS SA | MCA Master 200GT | MECAL A3  
Caribbean Marine Surveyors Ltd are Licensed Loss Adjusters in the BVI

Mr. Ball will generally opine that vessel sailed outside the navigational limits, tha the passage planning of the vessel was completely inadequate, that the weather conditions reported would not have rendered the vessel anywhere near a state where it was unsafe to return to a nearby safe port, provided it was well maintained and had adequate crew. Further, that the vessel was unseaworthy from the outset and the situation worsened as the voyage continued.

Please see Mr. Ball's written report, attached hereto, which provides and indicates the following: (i) statement of expert witness's opinions, (ii) data or other information considered by

expert witness in forming opinions, (iii) exhibits that will be used to support or summarize expert witness's opinions, (iv) expert witness qualifications, (v) previous expert witness testimony at trial or deposition, and (vi) compensation to be paid to expert witness for testimony at trial.

Please see list of attached documents:

1. Mr. Ball's resume
2. Mr. Ball's Report dated 8/16/2021
3. Mr. Ball's Report dated 9/4/2020
4. Maps produced by Mr. Ball
5. Invoice showing Mr. Ball's compensation

Dated: September 24, 2021  
Brookline, Massachusetts

GOLDMAN & HELLMAN  
Attorneys for Plaintiff  
233 Harvard Street  
Suite 211  
Brookline, MA 02446  
Tel (617) 566-4200  
Cel (617)320-9854  
Fax (617) 566-4292

By: /s/ Michael I. Goldman  
MICHAEL I. GOLDMAN ESQ.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by U.S. mail and by email on all counsel of record.

Dated: September 24, 2021  
Brookline, Massachusetts

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By: /s/ Michael I. Goldman  
MICHAEL I. GOLDMAN ESQ.